

Benjamin K. Lunch, State Bar No. 246015  
Wan Yan Ling, State Bar No. 297029  
NEYHART, ANDERSON, FLYNN & GROSBOLL  
369 Pine Street, Suite 800  
San Francisco, CA 94104  
Tel. (415) 677-9440  
Fax (415) 677-9445  
Email: [blunch@neyhartlaw.com](mailto:blunch@neyhartlaw.com)  
[wling@neyhartlaw.com](mailto:wling@neyhartlaw.com)

Attorneys for Plaintiffs

Geoffrey Wm. Steele, State Bar No. 219576  
STEELE, GEORGE, SCHOFIELD & RAMOS, LLP  
3100 Oak Street, Suite 100  
Walnut Creek, California 94597  
Tel. (925) 280-1700  
Fax (925) 935-1642  
Email: [gsteele@sgsrlaw.com](mailto:gsteele@sgsrlaw.com)

## Attorneys for Defendants

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

GOLDEN GATE LODGE OF PLASTERERS  
AND SHOPHANDS LOCAL UNION NO. 66,  
OPCMIA, AFL-CIO, et al.

**Plaintiffs,**

VS.

IRONWOOD PLASTERING, INC.;  
IRONWOOD SPECIALTIES, INC.; MAX  
KARL ROGERS; and LAURA ELIZABETH  
ROGERS

## Defendants.

Case No. 3:13-CV-03228-SI

## **STIPULATION FOR EXTENSION OF DISCOVERY**

NEYHART, 2  
ANDERSON,  
FLYNN &  
GROSBOLL  
ATTORNEYS AT LAW

**STIPULATION FOR EXTENSION OF DISCOVERY**

1 Pursuant to Local Rules 6-1 and 6-2, the parties through undersigned counsel hereby  
2 stipulate and respectfully request that the Court extend the deadline for Non-Expert Discovery  
3 and other pre-trial dates. The parties declare in support of this request:

4 WHEREAS, on July 28, 2014, the Court ordered that the Non-Expert Discovery Cutoff  
5 would be December 5, 2014 (Dckt. No. 39);

6 WHEREAS, on October 20, 2014, Plaintiffs submitted a letter to the Court summarizing  
7 its discovery dispute with Defendants (Dckt. No. 40);

8 WHEREAS, on October 29, 2014, the Court issued an order directing Defendants to  
9 produce requested electronic accounting files to Plaintiffs no later than November 3, 2014 (Dckt.  
10 No. 41);

11 WHEREAS, on November 7, 2014, Plaintiffs submitted a second letter to the Court  
12 summarizing its ongoing discovery dispute with Defendants (Dckt. No. 42);

13 WHEREAS, on November 12, 2014, the Court issued an order directing Defendants to  
14 produce requested electronic accounting files that can be opened to Plaintiffs no later than  
15 November 14, 2014 (Dckt. No. 44);

16 WHEREAS, as of November 14, 2014, Defendants have provided Plaintiffs with a  
17 username and password, but Plaintiffs continue to experience technical issues accessing the  
18 requested electronic accounting files, and are working with Defendants to resolve these issues;

19 WHEREAS, Plaintiffs require additional time to conduct a meaningful review of said  
20 electronic accounting files, so that depositions may be constructive;

21 WHEREAS, Plaintiffs would like the opportunity to complete mediation efforts with  
22 Defendants once said electronic accounting files have been reviewed;

1 THEREFORE, pursuant to Local Rule 6-2, the parties through their respective attorneys  
 2 stipulate as follows:

3 The parties respectfully request that the Court extend the Non-Expert Discovery Cutoff  
 4 date to February 20, 2015.

5 The requested time modification will affect the schedule for the case by necessitating that  
 6 the following dates be likewise moved:

Event	Current date	Proposed date
Dispositive Motions	February 6, 2015	April 24, 2015
Opposition	February 20, 2015	May 8, 2015
Reply	February 27, 2015	May 15, 2015
Hearing	March 13, 2015 at 9:00 AM	May 29, 2015 at 9:00 AM
Pretrial Conference	April 14, 2015 at 3:30 PM	June 30, 2015 at 3:30 PM
Court trial	April 27, 2015 at 8:30 AM in Courtroom 10, 19 <sup>th</sup> floor	July 13, 2015 at 8:30 AM in Courtroom 10, 19 <sup>th</sup> floor

16  
 17 If the proposed pre-trial dates are unavailable, the parties are agreeable to alternative dates  
 18 that the Court may schedule.

19 **IT IS SO STIPULATED AND AGREED.**

21 Dated: November 14, 2014

22 By: /s/ Wan Yan Ling  
 23 WAN YAN LING  
 Attorney for Plaintiffs  
 Neyhart, Anderson, Flynn & Grosboll

25 Dated: November 14, 2014

26 By: /s/ Geoffrey Wm. Steele  
 27 GEOFFREY WM. STEELE  
 Attorney for Defendants  
 Steele, George, Schofield & Ramos, LLP

## **ATTESTATION**

I, Wan Yan Ling, am the ECF user whose identification and password are being used to file the STIPULATION FOR EXTENSION OF DISCOVERY. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that Geoffrey Wm. Steele has concurred in this filing.

Dated: November 14, 2014

By: /s/ Wan Yan Ling  
WAN YAN LING  
Attorney for Plaintiffs  
Neyhart, Anderson, Flynn & Grosboll

Benjamin K. Lunch, State Bar No. 246015  
Wan Yan Ling, State Bar No. 297029  
NEYHART, ANDERSON, FLYNN & GROSBOLL  
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Fax (415) 677-9445  
Email: [blunch@neyhartlaw.com](mailto:blunch@neyhartlaw.com)  
[wling@neyhartlaw.com](mailto:wling@neyhartlaw.com)

Attorneys for Plaintiffs

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STEELE, GEORGE, SCHOFIELD & RAMOS, LLP  
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## Defendants.

Case No. 3:13-CV-03228-SI

**[PROPOSED] ORDER GRANTING  
STIPULATION FOR EXTENSION OF  
DISCOVERY**

1 Having considered the parties' Stipulation for Extension of Discovery, and for good cause  
 2 shown,

3 As amended

4 **PURSUANT TO STIPULATION, IT IS HEREBY ORDERED** that the Non-Expert  
 5 Discovery Cutoff date is now set for February 20, 2015. Likewise, the following pre-trial dates  
 6 are now set for:

7 <b>Event</b>	8 <b>Previous date</b>	9 <b>New date</b>
10 Dispositive Motions	11 February 6, 2015	12 April 24, 2015
13 Opposition	14 February 20, 2015	15 May 8, 2015
16 Reply	17 February 27, 2015	18 May 15, 2015
19 Hearing	20 March 13, 2015 at 9:00 AM	21 May 29, 2015 at 9:00 AM
22 Pretrial Conference	23 April 14, 2015 at 3:30 PM	24 June 30, 2015 at 3:30 PM
25 Court trial	26 April 27, 2015 at 8:30 AM in 27 Courtroom 10, 19 <sup>th</sup> floor	28 July 13, 2015 at 8:30 AM in Courtroom 10, 19 <sup>th</sup> floor

15  
 16  
 17  
 18 Dated: 11/17/14



19 The Honorable Susan Illston  
 20 United States District Judge